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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND ESC LOCAL 20 EXTENDING TIME  
TO RESPOND TO MOTION TO  
APPROVE SHORT-TERM INCENTIVE  
PLAN AND CONTINUING HEARING ON  
LIMITED OBJECTION TO EMPLOYEE  
WAGE AND BENEFITS MOTION**

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Engineers and  
4 Scientists of California, International Federation of Professional and Technical Engineers  
5 Local 20 (“**ESC Local 20**”) on the other. The Debtors and ESC Local 20 are referred to in this  
6 Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The  
7 Parties hereby stipulate and agree as follows:

## RECITALS

9           A.     On February 28, 2019, the Bankruptcy Court approved a final order [Dkt No. 705]  
10 (the “**Final Employee Wage and Benefits Order**”) granting the relief in the *Motion of Debtors*  
11 *Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for*  
12 *Interim and Final Authority to (I) Pay Prepetition Wages, Salaries, Withholding Obligations,*  
13 *and Other Compensation and Benefits; (II) Maintain Employee Benefits Programs; and (III) Pay*  
14 *Related Administrative Obligations* [Dkt No. 8] (the “**Employee Wage and Benefits Motion**”).

15        B. Pursuant to Paragraph 11 of the Final Employee Wage and Benefits Order, ESC  
16 Local 20's objection (the "**Employee Wage and Benefits Objection**"), as it relates to STIP  
17 Awards (as defined in the Employee Wage and Benefits Motion) solely for members of ESC  
18 Local 20, was preserved and scheduled to be heard at the hearing before the Bankruptcy Court  
19 on March 13, 2019, at 9:30 a.m. (Pacific Time), which hearing date was further continued to  
20 March 27, 2019, at 9:30 a.m. (Pacific Time) pursuant to the *Notice of Continued Hearing on*  
21 *Limited Objection to Employee Wages and Benefits Motion* filed by the Debtors [Dkt No. 798].

22 C. On March 6, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*  
23 *§§ 105(a), 363, and 503(c) for Entry of an Order Approving (I) Short-Term Incentive Plan and*  
24 *(II) Granting Related Relief* [Dkt No. 782] (the “**STIP Motion**”), which is set for a hearing  
25 before the Court at 9:30 a.m. on April 9, 2019. Any response or opposition to the STIP Motion  
26 is due by 4:00 p.m. (Pacific Time) March 20, 2019.

1                   D.     Counsel for ESC Local 20 has requested, and proposed counsel for the Debtors  
2 has agreed, that the time for ESC Local 20 to respond to the STIP Motion be further extended.

3                   E.     Proposed counsel for the Debtors has proposed, and counsel for ESC Local 20 has  
4 agreed, that the hearing on the Employee Wage and Benefits Objection, as it relates to STIP  
5 Awards (as defined in the Employee Wage and Benefits Motion) solely for members of ESC  
6 Local 20, be continued and preserved, pending the outcome of the hearing on the STIP Motion.

7                   **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE  
8 INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS  
9 STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE  
10 UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,  
11 THAT:**

12                   1.     The time for ESC Local 20 to file and serve any response or opposition to  
13 the STIP Motion is extended through 4:00 p.m. (Pacific Time) on March 28, 2019.

14                   2.     The Employee Wage and Benefits Objection of ESC Local 20, as it relates  
15 to STIP Awards (as defined in the Employee Wage and Benefits Motion) solely for members of  
16 ESC Local 20, will be preserved pending the outcome of the hearing on the STIP Motion.

17                   *[Signatures on next page]*

Dated: March 19, 2019  
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KELLER & BENVENUTTI LLP

*/s/ Jane Kim*  
Jane Kim

*Proposed Attorneys for Debtors  
and Debtors in Possession*

Dated: March 19, 2019  
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WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

*/s/ Caitlin E. Gray*  
Caitlin E. Gray

*Attorneys for Creditor Engineers and  
Scientists of California, Local 20, IFPTE*